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/s/ David F. Filler (DF-6850)

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

)
PARK AVENUE CONSULTING GROUP INC.,) Returnable _____ 2008
) 10:00 a. m. Room 21B
Plaintiff,)
) Civil Action No.08 Civ. 1850 (CM) (GWG)
v.)
) NOTICE OF MOTION
NEWGOLD INC. and FIRSTGOLD CORP.)
Defendants,)

To: BLAIR & ROACH, LLP
Attorneys for Defendants
2645 Sheridan Drive
Tonawanda, New York 14150

PLEASE TAKE NOTICE that Plaintiff Park Avenue Consulting Group Inc. by its undersigned attorney, pursuant to Federal Rule of Civil Procedure Rule 12(b)(6) and ¶ 2.D., Individual Practices of Judge McMahon, revised 2/3/2006, and New York's CPLR § 214.2; and based on the accompanying affirmation of David Filler and the Memorandum of Law, will bring a motion on for hearing before this Court at Room 21B, United States Court House, 500 Pearl Street, City of New York with no designated return date. In accordance with said Rule 2.D., answering papers or motions are to be served within two weeks of the receipt date of this Notice of Motion and filed promptly thereafter.

The relief sought is to Dismiss the Counterclaim. The grounds for the relief sought are set forth in the accompanying Memorandum of Law.

June 18, 2008

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By:

A handwritten signature in black ink, appearing to read 'D. Filler', with a stylized flourish at the end.

David F. Filler (Bar No. DF- 6850)

Courtesy Copy Sent by FED EX to:

Hon. Colleen McMahon,
U. S. District Court Judge
U. S. District Court
Southern District of New York
500 Pearl Street, 21-B
New York, NY 10007-1312